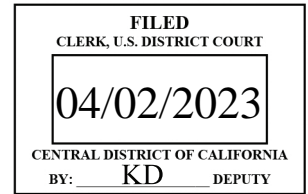


CLINTON BROWN, Pro Se
16821 Edgar Street
Pacific Palisades, CA 90272
clinton@atlasinc.solar
310-487-6453



Note: The Clerk must not refuse to file a paper solely because it is not in the form prescribed by these rules or by a local rule or practice. *Fed. R. Civ. P. 5(d)(4)*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CLINTON BROWN,
Plaintiff,
vs.
CLARK R. TAYLOR, AICP, THE
LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL
PLANNING,
Defendant.

CASE NO. 2:22-cv-09203-MEMF-KS
Motion to Limit Scope of Discovery
Judge: Honorable Maame Ewusi-
Mensah Frimpong
Magistrate Judge: Karen L.
Stevenson
Action Filed: 12/17/2022
Action Due: 01/12/2023

MOTION TO LIMIT SCOPE OF DISCOVERY

NOTICE TO THE COURT, in an action to review an administrative record, *F.R.C.P. 26(a)(1)(B)(i)*, exempts initial disclosure for a practical reason. The decision rendered by the administrative agency (i.e., Defendant) is presumably based on documents that the Plaintiff *has already provided to the Defendant*. (Emphasis added). Discovery, that is duplicative (*F.R.C.P. 26(b)(2)(C)(i)*) and outside the scope (*F.R.C.P. 26(b)(2)(C)(iii)*) will prejudice a just result.¹ If the

¹ Ex. A. *In summa*, Defendant's request for documents that are already available in the public record are duplicative and the demand for Plaintiff's family records are outside the scope of discovery, in addition to, the initial exemption.

moving party shows good cause, considering the limitations of *F.R.C.P.* 26(b)(2)(C), then the Court must specify conditions for discovery.²

THEREFORE, Plaintiff respectfully requests that the Court strike the Defendant's redundant and irrelevant discovery demands.

“I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.”



Clinton Brown

04/02/2023

² The Federalist No. 78, (1788).

1 DAWYN R. HARRISON, County Counsel
THOMAS R. PARKER, Senior Deputy County Counsel
2 (SBN 141835) • *Tparker@counsel.lacounty.gov*
648 Kenneth Hahn Hall of Administration
3 500 West Temple Street
Los Angeles, California 90012-2713
4 Telephone: (213) 974-1834 · Fax: (213) 613-4751

5 Attorneys for Defendant
Clark R. Taylor
6
7

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
10

11 CLINTON BROWN,

12 Plaintiff,

13 v.

14 CLARK R. TAYLOR,

15 Defendant.
16

CASE NO.

DEFENDANT'S FIRST SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS AND THINGS TO
PLAINTIFF CLINTON BROWN

17 PROPOUNDING PARTY: Defendant, CLARK R. TAYLOR

18 RESPONDING PARTY: Plaintiff, CLINTON BROWN

19 SET NO.: ONE
20
21
22
23
24
25
26
27
28

1 TO PLAINTIFF, CLINTON BROWN, AND HIS ATTORNEY OF RECORD:

2 You are hereby requested, pursuant to Rule 34 of Federal Rules of Procedure
3 to produce the following documents and things within thirty (30) days of service at
4 the Los Angeles County Office of the County Counsel, 500 West Temple Street,
5 Sixth Floor, Los Angeles, California 90012. Defendant will reimburse Plaintiff for
6 the reasonable costs of reproduction of all audio or video recordings of all
7 photographs produced pursuant to this request.

8 DEFINITIONS

9 For purposes of this Request for Production of Documents and Things:

- 10 a. "YOU" or "YOUR" refers to Plaintiff CLINTON BROWN.
- 11 b. "PROPERTY" or "PURCHASED PROPERTY" refers to the real property
12 identified by physical as 27250 Agoura Road, Agoura, California 91301.
- 13 c. "SELLER(S)" refers to the party or parties who were the immediate prior
14 owner(s) of 27250 Agoura Road, Agoura, California 91301 before YOU
15 purchased the PROPERTY.
- 16 d. "NOTICE DISCLOSURES" means all written notice disclosures made
17 and presented to YOU, YOUR family, YOUR agents or representatives
18 and any business entities acting on YOUR behalf in acquiring the
19 PROPERTY.
- 20 e. "TITLE INSURANCE AND DOCUMENTS" refer to all written
21 documents issued by a California Title Insurance Company hired to
22 prepare a title search of all recorded real property records related to the
23 PROPERTY or PURCHASED PROPERTY sale transaction through
24 which YOU or YOUR family and/or any business entity with ownership
25 interests in whole or in part held by YOU and/or YOUR family.
- 26 f. PROPERTY OR PURCHASED PROPERTY "FILE(S)" refers to all
27 written documents sent to and/or received by YOU or YOUR family or
28 any business entity in which YOU or YOUR family holds an ownership

1 interest in regarding the purchase by same of 27250 Agoura Road, Agoura,
2 California 91301 resulting in said persons or entities becoming the
3 recorded landowners of said PROPERTY.

4 g. "DOCUMENT" or "DOCUMENTS" means all "writings" and electronic
5 "recordings" as those terms are defined in Rule 34 of the Federal Rules of
6 Civil Procedure and Rule 1001 of the Federal Rules of Evidence,
7 including, but not limited to, all writings and records of every type and
8 description including , but not limited to, contracts, agreements,
9 correspondence, memoranda, letters, facsimiles, electronic mail ("e-mail"),
10 records of telephone conversations, handwritten and typewritten notes of
11 any kind, statements, reports, minutes, recordings, transcripts and
12 summaries of meetings, voice recordings, pictures, photographs,
13 drawings, computer cards tapes, discs, printouts and records of all types,
14 studies, instruction manuals, policy manuals and statements, books,
15 pamphlets, invoices, cancelled checks, things, and every other device or
16 medium by which or through which information of any type is transmitted,
17 recorded, or preserved. Without any limitations on the foregoing, the term
18 "DOCUMENT" shall include all copies that differ in any respect from the
19 original or others versions of the DOCUMENT, including but not limited
20 to, all drafts and all copies of such drafts and originals containing initials,
21 comments, notations, insertions, corrections, marginal notes, amendments,
22 or any other variation of any kind.

23 h. "PERSON" or "PERSONS" means all natural persons, partnerships,
24 corporations, joint ventures, and any kind of business, legal, or public
25 entity or organization, as well as its agents, representatives, employees,
26 officers, directors, and anyone else acting on its behalf, pursuant to its
27 authority, or subject to its control.

- 1 i. "SOCIAL MEDIA" means any online website or application that allows
 2 users to create or share content or to participate in social networking,
 3 including, but not limited to, platforms such as Instagram, Facebook,
 4 Twitter, Reddit, LinkedIn, Snapchat, Tiktok, Youtube, and Parler.
- 5 j. The phrases "REFERRING TO", "RELATING TO", or "REFLECTING",
 6 or any of their derivatives, mean in whole or in part discussing, describing,
 7 memorializing, containing, analyzing, studying, reporting on, commenting
 8 on, evidencing, constituting, embodying, identifying, stating, considering,
 9 recommending, setting forth, concerning, dealing with, or in any way
 10 pertaining to.
- 11 k. "INCLUDING" means "including, but not limited to", and is not to be
 12 construed to limit a request.
- 13 l. The singular form of a noun or pronoun includes within its meaning the
 14 plural form of the noun or pronoun so used, and vice versa; the use of the
 15 masculine form of a pronoun also includes with its meaning the feminine
 16 form of the pronoun used, and vice versa; the use of any tense of any verb
 17 includes also within its meaning all other tenses of the verb so used,
 18 whenever such construction results in a broader request for information;
 19 and "and" includes "or" and vice versa, whenever such construction results
 20 in a broader disclosure of documents or information.

21 INSTRUCTIONS

22 A. You are to produce all DOCUMENTS requested hereby that are in
 23 YOUR possession, custody, or control.

24 B. In the event that any DOCUMENT called for by this request is to be
 25 withheld on the basis of a claim of privilege, or immunity from discovery, that
 26 DOCUMENT is to be identified by stating: (i) any addressor and addressee, (ii) any
 27 indicated or blind copy; (iii) the DOCUMENT'S date, subject matter, number of
 28 pages, and attachments or appendices; (iv) all PERSONS to whom the

HOA.104138636.1

2:22-cv-8203-MEMF-KS

1 DOCUMENT was distributed, shown, or explained; (v) its present custodian; and
2 (vi) the nature of the privilege or immunity asserted.

3 C. In the event that any DOCUMENT called for by this request has been
4 destroyed or discarded, that DOCUMENT is to be identified by stating: (i) any
5 addressor or addressee; (ii) any indicated or blind copies; (iii) the DOCUMENT'S
6 date, subject matter, number of pages, and attachments or appendices; (iv) all
7 PERSONS to whom the DOCUMENT was distributed, shown, or explained; (v) the
8 date of destruction, discard, manner of destruction or discard, and the reason for
9 destruction or discard; and (vi) whether any copies of the DOCUMENT presently
10 exist and, if so, the name of the custodian of each copy.

11 **REQUEST FOR PRODUCTION NO. 1**

12 Please produce all TITLE INSURANCE AND INDORSEMENT
13 DOCUMENTS related to YOUR purchase and acquisition of the PROPERTY in
14 YOUR possession.

15 **REQUEST FOR PRODUCTION NO. 2**

16 Please produce all DOCUMENTS, including reports, memoranda, transcripts,
17 audio recordings, video recordings, filings, photographs, letters, and other
18 documents of any kind whatsoever, which report, memorialize, summarize, reflect,
19 depict, or in any way discuss YOUR file relating to YOUR purchase and acquisition
20 of the PROPERTY.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

HOA.104138636.1

2:22-cv-8203-MEMF-KS


REQUEST FOR PRODUCTION NO. 3

Please produce all DOCUMENTS including and relating to NOTICE DISCLOSURES provided to YOU regarding YOUR purchase and acquisition of the PROPERTY.

DATED: March 21, 2023

Respectfully submitted,

DAWYN R. HARRISON
County Counsel

By 
THOMAS R. PARKER
Senior Deputy County Counsel

Attorneys for Defendant, Clark R. Taylor

PROOF OF SERVICE

Case No. 2:22-CV-09203-MEMf-KS

STATE OF CALIFORNIA, County of Los Angeles:

Mark Zamora states: I am employed in the County of Los Angeles, State of California, over the age of eighteen years and not a party to the within action. My business address is 648 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012-2713

That on March 21, 2023, I served the attached

**DEFENDANT'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS TO
PLAINTIFF CLINTON BROWN**

upon Interested Party(ies) by placing ☐ the original ☐ a true copy thereof enclosed in a sealed envelope addressed ☐ as follows ☒ as stated on the attached service list:

☒ **By United States mail.** I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses on the attached service list (specify one):

(1) ☐ deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.

(2) ☐ placed the envelope for collection and mailing, following ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California:

☒ **By electronic service.** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed on the service list.

I declare that I am employed in the offices of a member of this court at whose direction the service was made.

Executed on March 21, 2023, at Los Angeles, California.

Mark Zamora
(NAME OF DECLARANT)

Mark Michael G. Zamora
(SIGNATURE OF DECLARANT)

SERVICE LIST

Clinton Brown
16821 Edgar Street
Pacific Palisades, California 90272
Email: clinton@atlasinc.solar

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28